

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA

UNITED STATES OF AMERICA,
Plaintiff,

Case No.: 3:10-cr-00170-HEH-1

JACK ROSGA,
Defendant.

**DEFENDANT’S MOTION FOR EXTENSION OF TIME TO FILE REPLY TO THE
GOVERNMENT’S RESPONSE TO DEFENDANT’S MOTION FOR COMPASSIONATE
RELEASE**

Defendant Jack Rosga, by and through his attorneys, Alexander E. Basinski, Esq., Lipsitz Green Scime Cambria, LLP; and Brian D. West, Esq., Sandground, West, Silek & Raminpour, PLC, hereby moves this Court for an order extending the original six (6) calendar day time period for filing of the Defendant’s Reply to the Government’s Response to Defendant’s Motion for Compassionate Release (“Motion”).

The government filed its response to Defendant’s Motion on November 16, 2020. (*See* Gov’t.’s Resp., Dkt. No. 1217.) Pursuant to Local Criminal Rule 47(F)(1), Mr. Rosga is permitted to file a reply brief within six (6) calendar days after the service of the government’s response brief. *See id.* As a result, Defendant’s reply brief is due to be filed no later than November 23, 2020.

Due to your deponent’s current caseload, preparation for an upcoming trial in the Western District of New York set to begin on December 8, 2020, and pre-existing deadlines for reply briefs in other federal cases, we respectfully request a fourteen day extension of the deadline from November 23, 2020 to December 7, 2020.

Your deponent has conferred with counsel for the government, Peter S. Duffey, Esq., who does not oppose this request.

DATED: Buffalo, New York
November 20, 2020

Respectfully submitted,

LIPSITZ GREEN SCIME CAMBRIA LLP

BY: /s/Alexander E. Basinski
Alexander E. Basinski, Esq. (*Pro Hac Vice*)
Erin McCampbell Paris, Esq. (*Pending Admission*)
Attorneys for Defendant, Jack Rosga
42 Delaware Avenue, Suite 120
Buffalo, New York 14202
(716) 849-1333
abasinski@lglaw.com
emccampbell@lglaw.com

SANDGROUND, WEST, SILEK &
RAMINPOUR, PLC

BY: /s/Brian D. West
Brian Denton West, Esq. (24947)
Attorneys for Defendant, Jack Rosga
8229 Boone Boulevard, Suite 610
Vienna, VA 22182
(703) 564-4600
brian@thewestlawgroup.com

TO: PETER S. DUFFEY, ESQ.
ASSISTANT UNITED STATES ATTORNEY
919 East Main Street, Suite 1900
Richmond, VA 23219

CERTIFICATE OF SERVICE

I hereby certify that on November 20, 2020, I electronically filed the foregoing pleading with the Clerk of the Court using the CM/ECF system, which then sent notification of such filing (NEF) to the following:

Peter S. Duffey, Esquire
United States Attorney's Office
Richmond Division
919 East Main Street, Suite 1900
Richmond, VA 23219
peter.duffey@usdoj.gov

_____/s/____

Brian D. West, Esq.